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5 *Attorneys for Defendants*
6 *VINTAGE, INC. dba VINTAGE POOLS and*
SARAH JACKSON

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 PHILADELPHIA INDEMNITY
10 INSURANCE COMPANY,

11 Plaintiff,

12 vs.

13 VINTAGE, INC. dba VINTAGE POOLS;
14 SARAH JACKSON; and DOES 1 through
X, and ROE CORPORATIONS, 1 through
X, inclusive,

15 Defendants.
16

CASE NO. 2:24-cv-1828

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANTS VINTAGE, INC. dba
VINTAGE POOLS and SARAH
JACKSON TO FILE RESPONSE TO
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION (ECF #3)
AND TEMPORARY RESTRAINING
ORDER (ECF #4)**

(SECOND REQUEST)

17
18 COME NOW, Defendants VINTAGE, INC. dba VINTAGE POOLS and SARAH
19 JACKSON("Defendants") by and through their counsel of record, John Henry Wright, Esq., of
20 The Wright Law Group, P.C., and Plaintiff PHILADELPHIA INDEMNITY INSURANCE
21 COMPANY("PIIC") by and through its attorney, Kurt C. Faux, Esq., of The Faux Law Group, and
22 hereby stipulate and agree as follows:

23 PIIC filed its Complaint (ECF # 1), Motion for Preliminary Injunction (ECF #3) and
24 Temporary Restraining Order (ECF #4) on September 30, 2024. On October 8, 2024 Defendants
25 were served with the Summons and Complaint (ECF # 9). On November 26, 2024 the Court
26 issued a Minute Order (ECF #10) directing the Defendants to file their response to Plaintiff's
27 Motion for Preliminary Injunction (ECF #3) and Temporary Restraining Order (ECF #4) by
28 December 10, 2024.

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The parties are currently negotiating and the underlying state lawsuit has been settled pending finalization of the settlement agreement currently with counsel for plaintiff in the underlying state case and Mr. Faux. Defendants have already partially performed under the terms of settlement agreement.

Therefore, the parties to the instant case hereby agree and request the Court's consent to extend the current deadline to oppose Plaintiff's Motion for Preliminary Injunction (ECF #3) and Temporary Restraining Order (ECF #4) by thirty days along with a continuation of the deadline set by the Court in its November 26, 2024 Minute Order.

IT IS HEREBY AGREED AND STIPULATED, that the deadline for Defendants to file a response to Plaintiff's Motion for Preliminary Injunction (ECF #3) and Temporary Restraining Order (ECF #4) shall be extended until January 30, 2025.

The parties have entered into the agreement and good faith and not for any improper purpose or delay. This is the parties' second request for an extension.

Dated this 3rd day of January, 2025.

THE FAUX LAW GROUP

/s/ Kurt C. Faux, Esq.

Kurt C. Faux, Esq.
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*Attorneys for Plaintiff PHILADELPHIA
INDEMNITY INSURANCE COMPANY*

Dated this 3rd day of January, 2025.

THE WRIGHT LAW GROUP, P.C.

/s/ John Henry Wright, Esq.

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*Attorneys for Defendants
VINTAGE, INC. dba VINTAGE POOLS and
SARAH JACKSON*

IT IS SO ORDERED.



**RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE**

DATED this 5th of January 2025.

